



UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

2011-8 P 2:17

LOUIS PIERRE DEABREU, *et al.*,

Complainants,

v.

Civil Action No. DKC 11-3692

NOVASTAR HOME MORTGAGE, *et al.*,

Defendants,

TOTHE HONORABLE JUDGE, OFFICIAL FUDICIARY, AND CHANCELLOR HOLDING THE CHANCERY COURT OF  
SPECIAL EQUITY FOR THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

**PRAYER FOR DECLARATORY RELIEF**

That wherefore your complainants, Louis Pierre and Renee Lavinia Deabreu being without relief save in a Court of Special Equity where such matters are properly cognizable; pray that the Court remedies the following relief in favor of the Complainants:

(1) That the material facts as stipulated in the filed Complaint in Equity were not disputed, and on several consensual mutually entered into voluntary contracts by and between complainant and defendants [included as exhibits in Complaint in Equity] acquiesced and consented to the redrafted stipulations of the voluntary contracts. Certificate of Non Response were served on all parties and by acquiescence accepted.

(2) That the Court of Special Equity/Chancery has jurisdiction in this suit

on grounds of injury due to breach of fiduciary duty and breach of contract including non-respond to Complaint In Equity by court order within 21 days and Defendants failure to plead or otherwise defend;

(3) That Honorable Judge award with EXTREME PREJUDICE, Declaratory Relief by February 9<sup>th</sup>, 2012, to Complainant due to defendant(s) default/non-response to Court Order;

(4) That Equity will not suffer a wrong without remedy and Complainants should be granted and made whole including all damages outlined in the Complaint In Equity;

(5) That Equity delights to do justice and not by halves, and due to non-response under court order to all stipulations in the Complaint in Equity, the Complainants pray the Honorable Judge grant :

- a. An affirmation of the rights of the parties relative to the complainant's property, including a declaration that Defendants has no enforceable lien against the complainant's property;
- b. Permanent injunction enjoining Defendants, their agents, assigns, and all person acting under, for, or in concert with defendants, from evicting the complainants from their home or from attempting to evict from said property including immediate stoppage of all levy, liens, judgments against wages and wages other than property;

- c. Cancellation, setting aside, annulling, illegal foreclosure sale, eviction and restitution of the home to the undersigned;
- d. An Order to declare the so-called foreclosure claim, that could result in the transfer of property from the undersigned to Plaintiffs, Null and Void;
- e. An Order annulling, canceling, setting aside all levy, liens and judgments of enjoined Defendants against Complainants and complete restitution, restoration and recompense of all finances;
- f. An Order Defendant(s) to pay punitive & compensatory damages in the amount of \$ 47,000,000.00; including but not limited to the undersigned the face value of the Note with interest, plus the escrow and all the bond/security derivatives of the Note;
- g. An Order of declaration and determination that the undersigned is the rightful holder of title to the Property;
- h. An Order for conveyance/re-conveyance of Title in favor of the undersigned;
- i. An Order declaring that persons, known and unknown at this time, including Defendants have no estate, right, title or interest in the Property, and that the undersigned are entitled to quiet and undisturbed possession of the property as described ante;

- j. An Order awarding the undersigned under election of relief for damages in the amount of \$46,610,221.00 (Forty Six Million, Six Hundred Ten Thousand, Two Hundred Twenty One United States Dollars) as stipulated in Complaint in Equity including interest, plus for recoupment of the payments previously tendered to defendant's predecessor under usury;
- k. An Order to Stay and Restraining Defendants, their agents, assigns, Charles County Sheriff from evicting Complainants from their property on February 9<sup>th</sup>, 2012;
- l. An Order that the Deed of Trust as used by the Defendants be declared and decreed to be null and void as stipulated in the Complaint In Equity, has violated of the unalienable rights and due process, guaranteed by the Constitution of the united States as claimed in the complaint;
- m. An Order that the Defendants correct any negative reporting by defendant to the Credit Bureaus;
- n. An Order that the Defendants correct any and all IRS records, including but not limited to 1099 a, 1099B, 1099C, 1099OID and any all IRS Information Reports;

**PRAYER FOR GENERAL RELIEF**

(5)That the Honorable Judge in the Court of Special Equity/Chancery orders:

- a. That Honorable Judge award with EXTREME PREJUDICE, Declaratory Relief to Complainants/Beneficiaries since said Defendants did not respond to subpoena and did not answer under penalty of perjury, point by point to the allegations stipulated herein.
- b. That the complainants/beneficiaries will not suffer wrongs without remedy, we pray to have such and other relief as the court may deem just and proper pertaining to all parties in this complaint.

**VERIFICATION**

- a. The Undersigned, under penalty of perjury with full commercial liability, does herewith swear, state, and affirm that the schedules, documents, and statements of account are true, correct, and complete to the best of the Undersigned's knowledge and that Louis Pierre & Renee Lavinia DeAbreu wrote and read the foregoing and know the contents thereof, and that the same, regarding the facts advanced herein, is true and correct based on the undersigned's personal knowledge to the best of the undersigned's current information, knowledge and belief. The

information presented in this Declaratory Relief is based on personal knowledge.

- b. The undersigned further acknowledges that this document is not intended to threaten, harass, intimidate, offend, conspire, blackmail, coerce, cause anxiety, alarm, contempt or distress, or impede any duty. The information herein is grounded on Louis Pierre & Renee Lavinia DeAbreu's personal knowledge, fact and law and is presented with honorable and peaceful intent, to protect the interest of the presiding Judge and all parties involved.

This DECLARATORY RELIEF is respectfully submitted this 8th day of February, 2012.

All Rights and Immunities Retained,

Respectfully submitted,

By:



Louis Pierre and Renee Lavinia Deabreu,  
Complainants/Beneficiaries